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The Indiana State Emergency Response Commission's Quarterly Newsletter Fall 2004

GOVERNMENT ACCOUNTABILITY OFFICE (GAO) REPORT: FEDERAL ACTION NEEDED TO ADDRESS SECURITY CHALLENGES AT CHEMICAL FACILITIES

The events of September 11, 2001, triggered a national re-examination of the security of thousands of industrial facilities that use or store hazardous chemicals in quantities that could potentially put large numbers of Americans at risk of serious injury or death in the event of a terrorist-caused chemical release.

Chemical facilities may be attractive targets for terrorists intent on causing economic harm and loss of life. Many facilities exist in populated areas where a chemical release could threaten thousands. The Environmental Protection Agency (EPA) reports that 123 chemical plants located throughout the nation could *each* potentially expose more than a million people if a chemical release occurred. To date, no one has comprehensively assessed the security of chemical facilities.

No federal laws explicitly require that chemical facilities assess vulnerabilities or take security actions to safeguard their facilities from attack.

Currently, the federal government has not comprehensively assessed the chemical industry's vulnerabilities to terrorist attacks. EPA, the Department of Homeland Security (DHS), and the Department of Justice have taken preliminary steps to assist the industry in its preparedness efforts, but no agency monitors or documents the extent to which chemical facilities have implemented security measures. Consequently, federal, state, and local entities lack comprehensive information on the vulnerabilities facing the industry.

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In October 2002 both the Secretary of Homeland Security and the Administrator of EPA stated that voluntary efforts alone are not sufficient to assure the public of the industry's preparedness.

As the events of September 11, 2001, showed, terrorists can cause enormous damage to our country by attacking infrastructure essential to our economy and jeopardizing public health and safety. Following these events, the President, in the National Strategy for Homeland Security, identified the chemical industry as one of 13 sectors critical to the nation's infrastructure. Across the nation, thousands of industrial facilities manufacture, use, or store hazardous chemicals in quantities that could potentially put large numbers of Americans at risk of injury or death in the event of a chemical release.

Even before September 11, 2001, protecting chemical facilities was the shared responsibility of federal, state, and local governments in partnership with the private sector. However, attention was focused largely on the risks of accidental, rather than intentional, chemical releases. Under the Clean Air Act, the Environmental Protection Agency (EPA) identified 140 toxic and flammable chemicals that pose the greatest risk to human health and the environment when present in certain quantities above threshold levels. According to EPA, approximately 15,000 facilities in a variety of industries produce, use, or store one or more of these chemicals beyond threshold amounts. Under the act, these facilities must take steps to prevent and prepare for an accidental chemical release, including developing risk management plans (RMP). These facilities are referred to as RMP facilities. [Editor: See RMP, p. 4). The events of September 11, 2001, brought heightened attention to security at chemical facilities and the possibility of a chemical release caused by a terrorist attack.

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CHAIRMAN'S CORNER

by Luther J. Taylor Sr., Chairman, Indiana Emergency Response Commission

Thanks to all of you who attended the 12th annual Local Emergency Planning Committee (LEPC) Conference on October 22nd. Once again, it was held in conjunction with the Emergency Management Alliance of Indiana conference. We'll have details in the next edition of the *Sercular.*

A special thank you goes out to South Bend/St. Joseph County for hosting the July Indiana Emergency Response Commission (IERC) meeting. I appreciate the kind words from Mayor Stephen J. Luecke in his opening remarks at the county/city council chambers. St. Joseph County Emergency Management Director Jeanne Mahoney also did a fine job as host.

We took the IERC meeting on the road second time in a row in September. The Ripley County LEPC served as host at the Friendship Fire Department. Members of the department and LEPC Chair Pat Thomas did a terrific job making us welcome. As a side note, the national muzzle loading championships were in town the same day. Don't ask Commission member Jim Pridgen how he did against staff member Kathy Dayhoff-Dwyer in a "shoot-off."

Speaking of Kathy, she is back on the job after an emergency appendectomy and doing well.

The Chemical Stockpile Emergency Preparedness Program (CSEPP) held a meeting of the Citizens' Advisory Commission in early October. The U.S. Army reported it would be ready to begin the destruction of nerve agent VX by the end of 2004. When work eventually gets underway, the timetable calls for a two-year process. Originally, the Army predicted demilitarization would take one year to accomplish.

CSEPP Training Officer R.O. Stanley also reported on the establishment of a database to track the records of everyone trained in awareness, decontamination, personal protective equipment, and ACT FAST (A nerve agent awareness program.). We now have one of the best sources of training information of any CSEPP state.

My congratulations to Lt. Colonel Scott Kimmel at the Newport Chemical Depot for receiving the Secretary of the Army Environmental Award in the Small Installation category. This annual award is the Army's highest honor for outstanding environmental stewardship programs.

Over the last several weeks SEMA, the Indiana Counter Terrorism and Security Council, and the State Department of Health have been on the road, bringing the 10 state regional planning districts up to speed on Homeland Security money available for Federal Fiscal Year 2005 and encouraging the establishment of regional planning districts to eliminate duplication of services, to make federal money go as far as possible.

The issue of the kinds of LEPC records that are open to the public is under discussion. The IERC Policy Committee is addressing the issue, to determine a consistent policy across the state for the release of information to the public.

'Til next issue.

(L to R) Michael Hurst, Director of Public Health Preparedness, Indiana Department of Health; Luther Taylor Sr., Executive Director, SEMA; and Earl S. Morgan Sr., Director of CTASC, respond to questions during the Planning District presentation at Wayne Township (Indianapolis) Fire Department.

FIELD NOTES

by Ian Ewusi-Wilson and Kathy Dayhoff-Dwyer

Has your Local Emergency Planning Committee (LEPC) received its 2004 funding from the Indiana Emergency Response Commission (IERC) yet?

If the answer is yes, then your LEPC met all of its annual legal requirements and also submitted the necessary documents as proof of activities for the 2003 calendar year. If the answer is no, then your LEPC may not have met the annual legal requirements for calendar year 2003 and/or did not submit the necessary documents for your LEPC's activities.

The formula for receiving your 2004 LEPC funding from the IERC is quite simple. It entails double-checking your records to ascertain that any and all outstanding documentation from 2003 is submitted. This will allow for the timely release of the monies to your committee. Additionally, make sure you have received receipt notifications from the IERC for calendar year 2003 on the following annual requirements:

- Legal Notices (a copy of the publisher's affidavit)
- Membership Roster (all categories filled in and the form signed)
- Fiscal Report (for previous year's expenditures along with the county treasurer's printout)
- Bylaws (if different from prior year's)
- Exercise Report (submit exercise request and credit reports)
- Plan Review (required updates)
- Meeting Minutes (4 meetings - 2 meetings per 6 months)

If you received funding, was the amount greater than, less than, or equal to that from the previous calendar years? The amount of funding received by each LEPC is directly proportional to the total number of Tier II reporting facilities in each county. This means that the greater the number of facilities in your county, the greater the amount of funding your LEPC will receive. So if your funding is greater than, less than, or equal to previous years' funding, then the number of facilities in your county may have increased, decreased, or remained the same, respectively. It is important to note that 90% of the hazardous chemical inventory fees collected by the state from Tier II facilities are returned to the LEPCs in the form of annual funding from the IERC. With this in mind, we would like to encourage all LEPCs, regardless of funding status, to police the funding source as follows:

- Compare your LEPC's compiled list of Tier II reporting facilities to that provided by the IERC annually to assure completeness and accuracy.
- Make certain that the IERC is aware of any and all discrepancies with the completeness and accuracy of these facilities.
- Verify that all Tier II facilities in your county are indeed meeting their legal obligation by reporting their chemical inventory status with the state, LEPCs, and local fire departments.
- Send notifications to all suspected Tier II facilities not documented as reporting facilities.
- Report to and/or seek assistance from the IERC regarding unresponsive facilities and their Tier II reporting status.
- Follow up with the IERC on progress made with notified/suspected non-reporting Tier II facilities.

We recognize that each LEPC is unique, dynamic, and frequently fluid. New persons recruited and welcomed into membership roles may not be familiar with the tasks required of the LEPC. Your field representatives will continue to provide you with the necessary information you need to maintain a successful committee.

Please remember that we are here to assist you, so contact us via telephone or email with your questions and suggestions at any time. We look forward to seeing you as we wander the highways and byways of Indiana visiting your LEPC or one nearby.

PREVENTION RULE (RISK MANAGEMENT PROGRAM) IN 2004

The Environmental Protection Agency (EPA) recently published revisions of the reporting requirements of the Chemical Accident Prevention Rule under Clean Air Act section 112(r). Under the rule, covered facilities must submit risk management plans (RMPs) to EPA, describing their chemical accident prevention programs. The revised rule removes the requirement for facilities to describe their offsite consequence analysis (OCA) in the executive summary of RMPs, adds several new data elements to RMPs, and requires more timely reporting of significant accidents and changes in emergency contact information. This *factsheet* provides a summary of these changes. It is important that owners, operators, plant managers, and others responsible for RMP implementation review this information.

BACKGROUND

Section 112(r) of the Clean Air Act (CAA) requires EPA to promulgate regulations for the prevention and mitigation of accidental releases of extremely hazardous substances. Under this section, EPA established a list of regulated substances and thresholds and issued the Chemical Accident Prevention regulations. The goals of this program are to prevent accidental releases of chemicals that could cause serious harm to human health or the environment and to reduce the severity of releases that may occur. Covered facilities are required to develop and implement a risk management program that includes a five-year accident history, an offsite consequence analysis, an accident prevention program, and an emergency response program. Companies must also submit to EPA a risk management plan (RMP) describing the source's risk management program. The original deadline for submitting RMPs was June 21, 1999. Since then, approximately 15,000 RMPs have been submitted. The chemical accident prevention regulations also require full updates and resubmissions of RMPs at least once every five years. Certain process and other changes as specified in the *Update* section of the Chemical Accident Prevention regulation (40 CFR 68.190) may require a facility to fully update and resubmit its RMP prior to the five-year anniversary of an RMP. The five-year anniversary date is reset whenever companies fully update and resubmit their RMPs. Most facilities submitted their initial RMPs by the original June 21, 1999 deadline and have not resubmitted their RMPs since. Therefore, the majority of facilities will need to fully update and resubmit their RMPs to EPA by June 21, 2004. All facilities are required to include the new data elements in their RMPs by June 21, 2004, whether they are filing an updated RMP by that date or not. Facilities filing a fully updated RMP by June 21, 2004 will be able to add the new information as part of their update. Facilities not filing a full update by that date will add the information to their RMPs through a correction. This factsheet provides additional information about the reporting deadlines and the recent changes in the RMP reporting requirements.

OVERVIEW OF CHANGES IN RMP REPORTING

EPA recently amended the Chemical Accident Prevention rule to: (1) Require that information on reportable chemical accidents be added to the RMP within six months of the date of the accident; (2) Require that changes in emergency contact information be reported within one month; (3) Remove the requirement to include a brief description of the off-site consequence analysis (OCA) in the RMP executive summary; and (4) Add three RMP data elements. EPA also amended the RMP*Submit format to expand the list of possible accident causes to include uncontrolled chemical reactions. As part of this rulemaking, EPA also clarified that the five-year deadline for updating RMPs that were originally filed early (i.e., submitted *before* June 21, 1999), is June 21, 2004. Facilities that filed early may have received correspondence indicating an earlier due date. However, EPA's interpretation of the regulations is that RMPs initially due on June 21, 1999 must be updated by June 21, 2004, not before. This clarification does not affect the five-year anniversary for facilities that updated their RMPs as a result of any process or other changes, as required under the *Updates* section of the regulation (40 CFR 68.190). For companies that submitted their initial RMPs *after* June 21, 1999, or have resubmitted since their initial submission, the five-year anniversary date is calculated as five years from the postmark date of their latest submission. The following sections discuss the recent changes to RMP reporting in more detail.

MORE TIMELY ACCIDENT REPORTING

Previously, facilities that had an accident meeting the criteria for inclusion in the five-year accident history section of their RMPs (section 6) could wait until they updated their RMPs to include information about that accident. Since RMPs may be updated as infrequently as every five years, EPA now requires facilities that have a

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reportable accident to revise section 6 of their RMPs to include information about the accident within six months of the accident's occurrence. Facilities reporting under Programs 2 and 3 must also revise the incident investigation information in their RMPs (reported as part of their Prevention Program Information, section 7 or 8 of the RMP). Specifically, these facilities must revise: (1) the date of investigation (40 CFR 68.170(j)) to reflect the date of the investigation of the accident being included in the fiveyear history; and (2) the expected date of completion of any changes due to that accident investigation (40 CFR 68.175(l)), and submit a corrected RMP within six months of the date of the accident. The criteria for determining which accidents must be included in the five-year accident history are found at 40 CFR 68.42. Guidance on the criteria and the reportable data elements for the five-year accident history are found in the *General Risk Management Program Guidance*, available the EPA website at: ***http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/EPAguidance.htm***

EMERGENCY CONTACT INFORMATION CORRECTIONS

In order to ensure that the emergency contact information is reasonably current, facilities are required to correct their RMPs to reflect any change in their emergency contact information within one month of the change.

DESCRIPTION OF OCA NO LONGER REQUIRED IN EXECUTIVE SUMMARY

Facilities subject to the Chemical Accident Prevention Rule are required to conduct an analysis of the potential off-site consequences of hypothetical worst-case and alternative accidental releases. Under the original rule, facilities were required to include a brief description of this analysis in the executive summary of their RMPs. EPA and federal law enforcement agencies have become concerned that OCA descriptions in executive summaries may pose a security risk, so EPA has revised the rule to remove this requirement. In view of security concerns, EPA expects that facilities will not include any OCA data in their executive summaries.

NEW DATA ELEMENTS

In addition to those data elements already required in the RMP, facilities must now also include: • The emergency contact e-mail address (if an email address exists); • The purpose and type of any submission that revises or other-wise affects previously filed RMPs; and • The name, address, and telephone number of the contractor/consultant who prepared the RMP (if any).

FOR MORE INFORMATION:

Home Page: ***www.epa.gov/emergencies***
RCRA, Superfund & EPCRA Call Center:
Phone: (800) 424-9346 or (703) 412-9810
TDD: (800) 553-7672 or (703) 412-3323
Monday - Friday 9:00 am - 5:00 pm Eastern Time
Closed Federal Holidays

RMP*SUBMIT FORMAT REVISION FOR RECORDING

In RMP*Submit 2004, facilities will be able to indicate, as part of their five-year accident history, if an accident involved an uncontrolled or runaway reaction. This new option was added in response to renewed concerns over these types of incidents.

REPORTING DEADLINES

The five-year deadline for updating RMPs that were submitted before or on June 21, 1999, was June 21, 2004. Most facilities submitted their initial RMPs by the original June 21, 1999 deadline and have not resubmitted their RMPs since. Therefore, the majority of facilities needed to fully update and resubmit their RMPs to EPA by June 21, 2004. Facilities that have updated their RMPs as a result of any of the changes specified in 40 CFR 68.190 will have a different anniversary date. All facilities were required to include the new data elements in their RMPs by June 21, 2004, whether they are filing an updated RMP by that date or not. For facilities filing an updated RMP (also referred to as a resubmission) by June 21, 2004, they were able to add the new information as part of their update. For resubmissions, facilities will continue to be required to submit their updated RMPs on diskettes/CDs with certification letters. For facilities not filing a full update by that date, they will be able to add the new data elements to their RMPs using a new Internet-based tool that EPA is developing. This tool will allow facilities to make revisions and other small changes in the administrative sections of the RMP on-line, eliminating the need to mail diskettes and certification letters for such corrections. This tool will not allow corrections of the executive summary entry within the administrative sections of the RMP, or of any other data element outside the administrative sections of the RMP. For any needed changes to those sections, facilities will continue to be required to submit their corrections on diskettes/CDs with certification letters. Companies should note that the rule revision removes the requirement to include a brief description of OCA in the executive summary. Effective April 9, 2004, OCA data are no longer required in the executive summary. April 9, 2004 was also the start date

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The federal government's role in protecting chemical facilities from terrorist attacks has been much debated since September 11, 2001. Initially, EPA had the lead responsibility for chemical security; currently the Department of Homeland Security (DHS)is the lead federal agency. For both agencies, public debate has centered on whether the federal government should impose security requirements on chemical facilities or whether voluntary industry actions are sufficient.

In summary, experts agree that the nation's chemical facilities may be attractive targets for terrorists intent on causing massive damage, but the extent of security preparedness since the events of September 11, 2001, is unknown. The risk of an attack varies among facilities depending upon several factors, including their location and the types of chemicals they use, store, or manufacture.

No specific data exist on the actual effects of successful terrorist attacks on chemical facilities. *However, according to EPA data on accidental toxic release "worst-case" scenarios, 123 chemical facilities located throughout the nation could each potentially expose more than one million people in the surrounding area if a toxic release occurred. Approximately 700 facilities could each potentially threaten at least 100,000 people in the surrounding area, and about 3,000 facilities could each potentially threaten at least 10,000 people. (Emphasis added).*

To date, no one has comprehensively assessed the security of chemical facilities; however, numerous studies and media accounts of reporters and environmental activists gaining access to facilities indicate that vulnerabilities exist.

Unlike water treatment facilities and nuclear power facilities, chemical facilities are not subject to any federal requirements to assess and address security vulnerabilities against terrorist attacks.

Currently, the federal government has not comprehensively assessed the chemical industry's vulnerability to terrorist attacks. As a result, federal, state, and local entities lack comprehensive information on the vulnerabilities the industry faces. However, federal agencies have taken some preliminary steps to assist the industry in its preparedness efforts. For example, EPA has issued warning alerts to the industry and informally visited about 30 high-risk facilities to learn about and encourage security efforts. According to EPA officials, EPA has provided information to DHS about the 15,000 facilities and DHS is currently identifying high-risk facilities and conducting site visits. In May 2002, Justice submitted an interim report to Congress that described observations on security at 11 chemical manufacturing facilities. As we reported in October 2002, however, Justice has not prepared a more comprehensive final report to Congress on the industry's vulnerabilities, which it was required by law to deliver in August 2002. In a February 2003 conference report on Justice's appropriations, Congress directed that funding be transferred to DHS for completing vulnerability assessments at chemical facilities.

In light of the challenges facing the industry and the gravity of the potential threat, we recommended in March 2003 that the Secretary of Homeland Security and the Administrator of EPA jointly develop a comprehensive national strategy for chemical security that is both practical and cost effective. This national strategy should:

- Identify high-risk facilities based on several factors, including the level of threat, and collect information on industry security preparedness;
- Specify the roles and responsibilities of each federal agency partnering with the chemical industry;
- Develop appropriate information-sharing mechanisms; and:
- Develop a legislative proposal, in consultation with industry and other appropriate groups, to require these chemical facilities to expeditiously assess their vulnerability to terrorist attacks and, where necessary, require these facilities to take corrective action.

Legislation is now before Congress that, if enacted, would direct DHS, or DHS and EPA, to adopt most of these recommendations.

DHS is also charged with continuing to develop the Chemical Sector Information Sharing and Analysis Center, a partnership with industry to facilitate the collection and sharing of threat information, by promoting the Center and recruiting chemical industry constituents to participate. A presidential directive issued in December 2003 designates DHS as the lead federal agency for chemical security, a change from national strategies issued in July 2002 and February 2003, which named EPA as the lead.

A number of other critical infrastructures have federal security requirements. All commercial nuclear power facilities licensed by the Nuclear Regulatory Commission are subject to a number of security requirements. The

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Aviation and Transportation Security Act of 2001 directed the Transportation Security Administration to take over responsibility for airport screening. The Public Health Security and Bio-terrorism Preparedness and Response Act of 2002 requires community water systems serving more than 3,300 people to conduct a vulnerability assessment, prepare an emergency response plan, certify to EPA that the vulnerability assessment and emergency response plan have been completed, and provide a copy of the assessment to EPA. To improve security in our nation's ports, the regulations implementing the Maritime Transportation Security Act of 2002 direct vessels and facilities - some of which are chemical facilities - to develop security plans.

Experts agree that chemical facilities present an attractive target for terrorists intent on causing massive damage, because many facilities house toxic chemicals that could become airborne and drift to surrounding areas if released. Chemical facilities could also be attractive targets for the theft of chemicals that could be used to create a weapon capable of causing harm. Justice has concluded that the risk of an attempt in the foreseeable future to cause an industrial chemical release is both real and credible.

In fact, according to Justice, domestic terrorists plotted to use a destructive device against a U.S. facility that housed millions of gallons of propane in the late 1990s. In testimony on February 6, 2002, the Director of the Central Intelligence Agency warned of the potential for an attack by al Qaeda on chemical facilities.(Italics added).

For some facilities it is conceivable that an attack where multiple chemical vessels were breached simultaneously could result in an even larger release, potentially affecting a larger population than estimated in the RMP "worst-case" scenarios. Other factors besides location and the quantity of chemicals onsite could also make a facility a more attractive target. For example, a facility that is widely recognizable, located near a historic or iconic symbol, or critical to supporting other infrastructures could be at higher risk. A 2002 Brookings Institution report ranks an attack on toxic chemical facilities behind only biological and atomic attacks in terms of possible fatalities.

Currently, no one has comprehensively assessed security across the nation at facilities that house chemicals. According to a 1999 study by the Department of Health and Human Services' Agency for Toxic Substances and Disease Registry (ATSDR), security at chemical facilities in two communities was fair to very poor.

ATSDR observed security vulnerabilities such as freely accessible chemical barge terminals and chemical rail cars parked near residential areas in communities where facilities are located. Following visits to 11 chemical facilities, Justice concluded that some facilities may need to implement more effective security systems and develop alternative means to reduce the potential consequences of a successful attack. The ease with which reporters and environmental activists gained access to chemical tanks and computer centers that control manufacturing processes at chemical facilities in recent years also raises doubts about security effectiveness at some facilities.

The chemical manufacturing industry has undertaken a number of voluntary initiatives to address security concerns at chemical facilities, including developing security guidelines and tools to assess vulnerabilities, but major challenges remain. All of the member facilities generally follow a multi-step process that includes:

- Evaluating on-site chemical hazards, existing safety and security features, and the attractiveness of the facility as a terrorist target;
- Using hypothetical threat scenarios to identify how a facility is vulnerable to attack; and:
- Identifying security measures that create layers of protection around a facility's most vulnerable areas to detect, delay, or mitigate the consequences of an attack.

While these are commendable actions, they do not provide a high level of assurance that chemical facilities have better protected their facilities from terrorist attack. First, ACC does not require third parties to verify that the facility has conducted the vulnerability assessment appropriately or that its actions adequately address security risks. Even though compliance with ACC's safety and security requirements is a condition of membership, we do not believe that its requirements for facilities to periodically report on compliance with these requirements is an effective enforcement measurement because ACC does not verify implementation or evaluate the adequacy of facility measures.

(The above is excerpted verbatim from the February, 2004, GAO report to Congress on US chemical plant security)

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PROTECTING COMMUNITIES FROM CHEMICAL HAZARDS: INHERENT SAFETY AT WORK

Choosing inherently safer technologies - modifying production or products to use safer or fewer chemicals, reduced chemical quantities, or processes involving safer pressures, temperatures or other conditions - reduces or eliminates the possibility of a chemical release. This option must be the option of first resort when looking to protect communities from the potential impacts of chemical terrorism, as the tactics employed by terrorists are likely to be unaffected by mitigation measures (such as safety valves) and increased physical security.

There are many examples of successful efforts to protect communities by removing or reducing chemical hazards:

- In Washington, D.C., the city's Blue Plains Sewage Treatment Plant is switching from volatile chlorine gas to less volatile sodium hypochlorite bleach, which has far less potential for airborne off- site impact. The facility initially intended to change processes over the course of several years, but in the wake of September 11th, completed the switch in a matter of weeks.
- After the Bhopal chemical accident in 1984, Dupont eliminated all storage of methyl isocyanate (the chemical released in Bhopal) by switching to a closed loop process that manufactures only as much of the chemical as is used immediately in the process.
- In Cheshire, Ohio, American Electric Power selected a urea- based pollution control system rather than one involving large-scale storage of ammonia that would have endangered the surrounding community.
- In Cuyahoga County, Ohio, ALCOA reduced its potential off-site impact by working with local emergency planners and ending on-site storage of hydrofluoric acid and nitric acid.
- A recent study of Local Emergency Planning Committees identified successful examples of hazard reduction in eight communities, involving ammonia, chlorine, toluene diisocyanate, and cyanide.
- In New Jersey, hundreds of water treatment plants have switched away from or below threshold volumes of chlorine gas as a result of the state's Toxic Catastrophe Prevention Act - from 575 such water treatment facilities in 1988 to just 22 in 2001.

[For more information, contact Jeremiah Baumann at U.S. PIRG, (202) 546-9707].

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for the new accident reporting requirement. Any reportable accident occurring on or after April 9, 2004 must be included in the five-year accident history section of the RMP within six months of the accident.

WHAT'S NEXT?

We anticipate that the new version of RMP*Submit (known as RMP*Submit 2004) will be released shortly. In addition, we expect that the internet-based tool for correcting the administrative sections of the RMPs online (known as RMP Web Registration Correction) will be available in May 2004. For up-to-date information on the status of these and other products associated with the RMP program, visit our "What's New" page. We plan to update this information on the first of each month to reflect new developments and product status.

Visit our "What's Next" page:
http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/whatsnext.htm